



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

MAY 14 2015

Sergio Obregon  
National Environmental Policy Act Coordinator  
U.S. Army Garrison Yuma Proving Ground  
IMYM-PWE  
Yuma, Arizona 85365-9498

Subject: Final Programmatic Environmental Impact Statement of Activities and Operations at Yuma Proving Ground, Arizona (CEQ # 20150113)

Dear Mr. Obregon:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

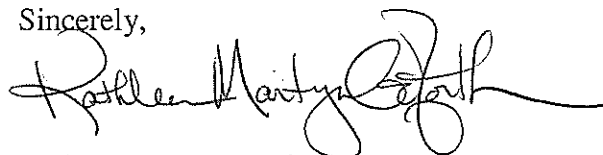
EPA reviewed the Draft Programmatic EIS and provided comments to the U.S. Army on September 12, 2013. We rated the DPEIS as *Environmental Concerns – Insufficient Information (EC-2)* due to our concerns regarding the need for additional analysis of project-specific impacts included as part of the programmatic assessment. Further, we identified the need for analysis of the potential impacts of new testing and training activities that could result from the proposed expansion of mission capabilities and associated infrastructure. We also provided recommendations regarding fire risk, hazardous materials, aquatic resources, air quality, wildlife, and other measures to prevent impacts to the environment.

We appreciate the additional information included in the Final Programmatic EIS that is responsive to EPA comments. Specifically, we appreciate the inclusion of the additional analysis of direct and indirect impacts on several short-term projects considered in detail. To the extent that the FPEIS contains commitments by the Army, including commitments for mitigation, monitoring, and other activities specified in Table 2-11, we recommend they be included in the Record of Decision.

The Army deferred further analysis of the Aberdeen Road improvements to the Clean Water Act Section 404 permit, since that project has not yet been designed. In general, EPA recommends the use of clear-span bridges to cross drainages, wherever practicable, or the use of bottomless culverts or oversized box culverts buried below stream grade to encourage natural channel substrate for terrestrial and aquatic life and a more natural sediment transport regime. EPA will work with the Corps of Engineers when the 404 permit is proposed to help minimize impacts to waters of the U.S.

EPA appreciates the opportunity to review this FPEIS. If you have any questions, please contact me at 415-972-3521, or contact Phillip Lopez, the lead reviewer for this document, at 415-972-3210 or [lopez.phillip@epa.gov](mailto:lopez.phillip@epa.gov).

Sincerely,

A handwritten signature in black ink, reading "Kathleen Martyn Goforth". The signature is fluid and cursive, with the first name "Kathleen" being more legible than the last name "Goforth".

Kathleen Martyn Goforth, Manager  
Environmental Review Office